CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET SACRAMENTO, CA 95814-5512



October 24, 2000

Timothy G. Smith Vice President. Power Development Sunlaw Energy Corporation P. O. Box 58324 Los Angeles, CA 90058

Dear Mr. Smith

NUEVA AZALEA POWER PLANT PROJECT DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This second set of data requests (#87-135) is being made in the areas of air quality, cultural resources, land use, noise, socioeconomics, soil & water resources and traffic & transportation. In the first set of requests, three requests were inadvertently misnumbered. This round starts with the correct number. Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 27, 2000, or at such later date as may be mutually agreed. Supplemental information for the first set of requests that had inadequate responses is due no later than November 1, 2000.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Commissioner Robert Pernell, Presiding Committee Member for the Nueva Azalea Power Plant Project proceeding, and to me, within 15 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations section 1716 (e)).

If you have any questions, please call me at (916) 653-1245, or E-mail me at jreede@energy.state.ca.us.

Sincerely,

James W. Reede, Jr. Energy Facility Siting Project Manager

Enclosure

cc: POS

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Technical Area: Air Quality Author: Guido Franco

BACKGROUND

During the public workshop held in the City of South Gate on October 18, the Applicant indicated that there are going to be two new projects close to the proposed power plant. One of them may be the projected increase in production at the Blue Diamond Materials facility. This is an asphalt batch processing facility located along the north side of Southern Avenue, just west of Garfield Avenue and east of Route 710 Long Beach Freeway (please see the "Traffic Impact Study Blue Diamond Materials. South Gate, California" Preliminary Working Draft Document prepared for Blue Diamond Materials, August 16, 2000). The cumulative impact analysis would need to include the impacts from these new potential sources if they are under construction or if they are in the permitting process.

The City of Downey in a letter sent to Mr. James Reede, Jr. and dated July 25, 2000 also indicates that "there are several planned projects in Downey, including the Boeing Master Plan." Similar projects may be planned in the City of South Gate and the surrounding cities. SCAQMD is assisting CEC Staff in searching their records with respect to projects that should be included in the cumulative impact analysis. However, contacting the relevant cities directly may uncover additional projects that should be included in the cumulative impact analysis.

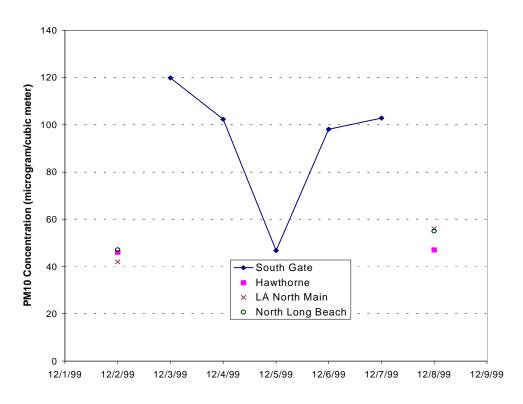
DATA REQUEST

- 87. Please provide information regarding the new and/or modified facilities mentioned by the Applicant on October 18, 2000. Please include all the information that would be needed to model these facilities including the expected net change in traffic due to these facilities. The information shall include hourly and daily emissions for NO_x, NO, CO, VOC, PM10, and SO_x. Please also include as much as possible data regarding the location where these emissions would take place, and, if there are stacks, include the stacks parameters needed for conventional air dispersion modeling analysis. In the case of mobile sources, please also include the data in a format needed for the CALINE model.
- 88. Please contact the relevant cities for this case and request information on planned projects in a six mile radius from the proposed site to find out if enough information is available to allow for their inclusion in the cumulative impact analysis for this project. Please note that the Siting Regulations direct CEC Staff to consider projects under construction or with permits pending before a local and/or state agency. For those adequately defined projects, please provide the standard air quality information needed for air dispersion modeling. Please provide copies of the contact letters and responses.

BACKGROUND

The applicant has measured ambient air quality conditions for about a week in December 1999 at the site where the power plant would be located. Currently, this site is utilized as a truck depot and tractor/trailer-parking site. The air quality data suggests that PM10 ambient concentrations at this site may be higher than measurements taken in the closest monitoring stations maintained by SCAQMD (see the figure below). This may be due to the high contribution by the heavy-duty diesel trucks being serviced and coming in and out of the transfer site and the relatively close proximity to freeway 710. Please note that the PM10 data are collected every six days at the regular air quality station maintained by SCAQMD. For this reason, the PM10 data for Hawthorne, Los Angeles North Main, and North Long Beach only include concentrations for December 2nd and 8th.





At the October 18, 2000 public workshop there was some disagreement with respect to the actual background ambient air concentrations that should be used for this project. One common practice is to use the data from the closest and most relevant air quality monitoring station, but the data collected in December 1999 suggest that this practice may not be appropriate in this case. In addition, the heavy concentration of industries and truck depot facilities suggest the need for a local source of air quality data. Finally, the Environmental Justice analysis will be greatly enhanced with more relevant air quality data for South Gate.

October 24, 2000 2 Air Quality

In our opinion, the Applicant should only collect data for CO, NO₂, and PM10 since the concentration for the other pollutants should be much lower than the more stringent air quality standards. For practical purposes the collection of data should start as soon as practical and it should end at most one month before the expected released of the Final Staff Assessment.

DATA REQUEST

89. Please suggest locations for an air quality monitoring station that would collect CO, NO₂, and PM10 concentrations representative for the conditions in the cities of South Gate and Downey. Please present a schedule for the deployment of such monitoring station. Please follow as much as practical the guidelines prepared by the U.S. EPA for the selection and deployment of air quality monitoring stations. A collocated standard meteorological station would be useful but not necessary.

BACKGROUND

The Applicant is requesting a NO_x permitted level of 1 part per million (ppm) (one-hour average). This is a very low concentration level that is almost one half of the recently permitted levels for new power plants in California. However, there are known measurement problems with such low levels of emissions. Existing regulatory reference methods for NO_x were developed when the emission levels were 50 to 100 ppm. SCAQMD estimates that the level of uncertainty using exiting methods is on the order of 1 ppm. This means that the measurement uncertainty may preclude the accurate measurement of NO_x emissions for the proposed power plant. The Air Resources Board and the CEC are collaborating on a project designed to collect data regarding the performance of existing measurement methods. ARB may adopt interim regulatory methods before next summer to improve the accuracy of the NO_x measurement methods used in newly licensed power plants.

DATA REQUEST

90. Please provide a technical discussion in support of the likelihood that the proposed project would operate at or below 1 ppm even when using more accurate measuring systems. This discussion may include a presentation of any monitoring enhancement work performed by the developers of the SCONOxTM system to eliminate or to take into account problems such as the loss of NO_x in condensed water in the sampling lines or the lack, until recently, of low concentration calibration gases.

BACKGROUND

The Applicant submitted a new modeling analysis in response to one of our previous data requests dealing with the issue of proper modeling of the cylinders surrounding the stacks. This modeling analysis changed the distribution of impacts.

October 24, 2000 3 Air Quality

Some Intervenors are also interested in potential impacts on specific sensitive receptors.

DATA REQUEST

- 91. Please review the information presented with the Application of Certification, including its supplements to make sure that the data and graphs are updated with the new modeling results.
- 92. Please provide a table with the air dispersion modeling results for the following receptors located no more than 3 miles from the facility: 1) hospitals, 2) schools, to include Los Padrinos Juvenile Justice Center, 3) convalescent centers, and 4) other similar facilities.

BACKGROUND

The Applicant is requesting a four-month Commissioning period. The first two months will be for adjustments and fine-tuning of the combustion system and other operations typically executed during commissioning. During the first two months the power plant would operate without SCONOxTM and therefore emissions will be much higher than during normal commercial operation.

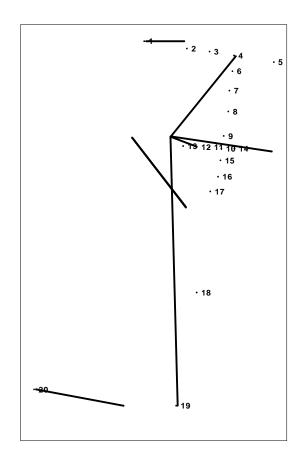
DATA REQUEST

93. Please explain how the Applicant plans to minimize the actual commissioning period and also explain why a two month period is needed without SCONOxTM when the full commissioning periods for other similar size facilities are usually less than two months.

BACKGROUND

The following figure presents the line sources and the location of the receptors used with the CALINE model to estimate the impacts due to the heavy trucks and also due to the J.B Hunt truck depot emissions. It is difficult to understand the rational used in the selection of the receptor and the representation of the nearby roads.

October 24, 2000 4 Air Quality



Please prepare a figure such as the above figure with the names of the streets and roads that each line is supposed to represent. Please also draw the boundaries of the J.B. Hunt truck depot site and clearly identify the location of the receptor that represents the 1999 air quality station. Please also include a scale to this figure.

Technical Area: Cultural Resources

Author: Jeanette A. McKenna and Gary Reinoehl

BACKGROUND

The text of the application noted completion of studies by Beth Padon of Discovery Works. However, all correspondence and data presented fails to mention Ms. Padon or any participation on her part. As a requirement of all records checks completed for the Archaeological Information Centers in California (in which projects included field investigations), technical reports are required.

DATA REQUEST

94. Please provide a copy of the technical report prepared by Ms. Padon/ Discovery Works. If a technical report was not completed (as indicated in the data response) please make arrangements to have the document prepared.

BACKGROUND

Technical studies completed within urban areas generally include a discussion of land use history and the potential for buried historical resources. No such discussion is presented in the application. Such data is necessary to assess the sensitivity and potential for subsurface historical resources.

DATA REQUEST

95. Please provide the discussions necessary to address the historic land use of the property (preceding the occupation of the property by J.B. Hunt) and the associated roadways that may be impacted by the proposed gas line.

BACKGROUND

The discussions of prehistory are relatively vague. Quick research indicated that a prehistoric village site was located near the confluence of the Los Angeles River and the Rio Hondo Channel. The area should be considered sensitive for such buried resources, especially since the exact location of the village is unknown.

DATA REQUEST

96. Develop a discussion to address the sensitivity for buried prehistoric resources along the Los Angeles River (and Rio Hondo Channel), including comments provided by the Gabrielino representative, Sam Dunlap.

BACKGROUND

The data regarding Native American consultation (with the Native American Heritage Commission and the list of Native American Representatives) was generated through Black & Veatch and not by the archaeological consultant. This data is generally compiled by the archaeological consultant for inclusion in the technical report.

August 28, 2000 6 Cultural Resources

DATA REQUEST

97. Was this data made available to the consultant?

BACKGROUND

The standing structures were investigated by Jan Ostashay of PCR Services Corp. The forms included in the response package were all dated October 4, 2000; indicating they were generated well after the initial data request was prepared. Each of the forms identify the standing structures as "Historic" (Line P6), but the date of construction is not presented.

DATA REQUEST

98. Please correct the forms by adding the date of construction.

BACKGROUND

The applicant provided DPR Form 523 for buildings at 5625 Southern Avenue and 5730 Southern Avenue. Both of these buildings have a period of significance of 1950. The discussion of the historical or architectural context as defined by theme, period, and geographic scope is limited. The discussion of integrity of the properties was also limited. Since both of these buildings are about 50 years old, staff needs the following information to complete the analysis.

DATA REQUEST

- 99. Please discuss the importance of these buildings in terms of historical and architectural context (e.g. post world war II industrial expansion). Include in the discussion whether these buildings are associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; are associated with the lives of persons important in our past; embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values; and have yielded, or may be likely to yield, information important in prehistory or history.
- 100. Please describe the types and locations of modifications that have compromised the integrity of the buildings. Include in the discussion the following aspects of integrity: location, design, setting, materials, workmanship, feeling, and association.

October 24, 2000 7 Cultural Resources

Technical Area: Land Use

Author: Tom Buford

BACKGROUND

The City of South Gate Zoning Ordinance provides for site plan review and approval of development projects, including review of compliance with site improvement restrictions and development standards. The response to Data Request No. 47 set forth the relevant standards in table form, and Drawing 3.4-2 identified development on the site, not drawn to scale and absent dimensions. The site improvement restrictions and development standards are, in several cases, dependent on the proximity to site boundaries and neighboring uses.

DATA REQUEST

- 101. Please submit a written site plan for the project, drawn to scale, and identifying the following:
 - a. Site boundaries, dimensions, ownership and use of neighboring properties, and adjacent roadways and streets;
 - b. Location of buildings and uses (e.g., roadways and paved areas) on the project site, including distances to project site boundaries;
 - c. Location of proposed walls and fences, including construction materials, heights, and distances to project site boundaries;
 - d. Computation of the floor area contained in buildings, as referenced in Section 11.24.050;
 - e. Identification of open spaces and landscaped areas;
 - f. Location of trash enclosures;
 - g. Identification of vision clearance areas at any corner or reverse corner lot, as required in Section 11.32.110;
 - h. Location and number of off-street parking spaces to be provided, as required in Chapter 11.34;
 - i. Locating of proposed signage; and
 - Location of existing and proposed easements, and utility connections at the property line.

BACKGROUND

The City of South Gate Zoning Ordinance, Chapter 11.31, provides policies and development standards for signs, and Section 11.41.020 provides criteria for approval of site plans. The response to Data Request 45 indicated that the applicant anticipated the installation of one ground sign and possibly additional signage on top of the stacks.

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DATA REQUEST

102. Please provide a written drawing of any signs proposed, including dimensions, materials, and proposed lighting.

BACKGROUND

The South Gate Zoning Ordinance, Chapter 11.33, provides standards for landscaping of industrial projects, and for the review and approval of a planting and irrigation plan in connection with new development. Section 11.33.040 provides the criteria for approval.

DATA REQUEST

- 103. Please provide a written planting and irrigation plan setting forth the information required for review pursuant to Section 11.33.060, including the following:
 - a. Areas that will be landscaped;
 - b. Computation of the project site area to be landscaped;
 - c. Computation of the percentage of the interior of any parking lot or area that will be landscaped;
 - d. Identification of species that will be planted;
 - e. Location and type of irrigation proposed.

BACKGROUND

The project proposes construction of electrical transmission lines east of the project site, connecting to existing electrical transmission lines on the east side of the Rio Hondo Channel.

DATA REQUEST

104. Please provide a list of each landowner over whose property the electrical transmission lines would pass.

October 24, 2000 9 Land Use

Technical Area: Socioeconomics

Author: James Adams

BACKGROUND

The proposed Nueva Azalea project would be located near the border between the cities of South Gate and Downey. The Nueva Application for Certification discusses the socioeconomic impacts of the proposed project on South Gate. However there is very little discussion about these impacts on Downey or other neighboring communities in the region.

DATA REQUEST

105. Please provide an analysis of the socioeconomic impacts, beneficial or adverse, of the Nueva project on the communities of Downey, Huntington Park, Bell Garden, Cudahy and Lynwood.

October 24, 2000 10 Socioeconomics

TECHNICAL AREA: Traffic and Transportation

Author: Lance Pagel and James Fore

BACKGROUND

The AFC is unclear regarding project related impacts on roadways bordering the site. East Frontage Road, which is adjacent to the 710 Freeway, serves as primary access for the Thunderbird Mobile Home Park.

DATA REQUEST

106. Please include an evaluation and discussion regarding project-related impacts and mitigation for roadways that border the site. This evaluation should include discussion of roadway pavement conditions, and access accommodations for the Thunderbird Mobile Home Park on East Frontage Road.

BACKGROUND

The AFC states on page 5-223 that a "small number of shipments of hazardous material" will occur during and after the construction phase. It is unclear as to when shipments will occur, and specifically what route will be used. The AFC does not state when the transport of large structures will occur. Specific haul routes to be used for delivery of hazardous material and large structures should be identified.

DATA REQUEST

107. Please clarify when shipments and deliveries are to occur, and specifically what route will be used for the delivery of hazardous material and large structures.

BACKGROUND

The County of Los Angeles Congestion Management Plan (CMP) specifies that an intersection having an impact of 50 or more trips during peak hours as a result of a proposed project requires a traffic analysis.

DATA REQUEST

108. Please explain why the intersection of Garfield Avenue at Karmont Avenue and the intersection of Garfield Avenue at the driveway to Target Shopping Center/Casa De Gonzales Auto Dealership are not included in this analysis. These signalized intersections are impacted by 50 or more project trips.

BACKGROUND

Bicycle and pedestrian facilities are not discussed in the AFC. The project may impact bicycle and pedestrian transportation systems on adjacent roadways.

DATA REQUEST

109. Please provide an inventory of bicycle and pedestrian systems on area roadways, and discuss impacts caused by the addition of project trips.

BACKGROUND

There are discrepancies regarding the number of vehicle trips generated during the construction phase. The AFC states on page 5-221 that the construction activity will generate a maximum of 1,428 trips per day (98 peak hour trips). On page 5-222, it states that 1,784 daily trips will be generated by construction with 123 occurring during the peak hour.

DATA REQUEST

110. Please explain the discrepancy between trip generation data on pages 5-221 and 5-222.

BACKGROUND

The AFC states on page 5-222 that construction work hours are 10 hours a day, four days a week. Table 3 in Appendix X states that the typical construction schedule is 7:00 a.m. to 3:30 p.m.

DATA REQUEST

111. Please explain the discrepancy between the AFC text regarding construction work hours and trip generation assumptions used in Table 3 of Appendix X.

BACKGROUND

Table 3 in Appendix X states that trips generated by the project during peak hours only include commute trips. It is unclear as to why non-commute trips were not included in peak hour trip estimates and how non-commute trips would be enforced to occur during off-peak periods.

DATA REQUEST

112. Please clarify the basis for this assumption. Please explain how project-related non-commute trips will only occur during off-peak hours.

BACKGROUND

The AFC states that on-site parking is not feasible during the 13th and 14th months of construction. On-street parking could interfere with traffic operations on adjacent roadways, and hinder access to the Thunderbird Mobile Home Park provided by the East Frontage Road.

DATA REQUEST

113. Please provide a determination of feasible parking options including location and number of parking spaces to be used during the 13th and 14th months of construction. Please include a discussion of parking demand and supply for the duration of the construction phase.

BACKGROUND

There is a potential for visibility impairment due to vapor plumes produced by the project reaching ground level on adjacent roadways. This may affect traffic safety on the local roadways in the vicinity of the project site (e.g., Interstate 710, Garfield Avenue). CalTrans has expressed concern that the plume modeling previously provided does not take into consideration the possibility of vapor plumes reaching the freeway level under various atmospheric conditions, particularly fog and low clouds.

DATA REQUEST

- 114. Please provide an analysis of the traffic safety impacts resulting from the expected plumes from the project on adjacent roadways.
- 115. Please revise the plume modeling to take into account this worst case scenario (to determine if this can happen) and measures to prevent this from happening and how many days per year with the occurrence of a variety of atmospheric conditions.
- 116. Please describe proposed mitigation to counter the impacts of the vapor plume upon traffic and public safety using State transportation facilities

BACKGROUND

The project proposes to install a sound wall adjacent to the Thunderbird Mobil Home Park and landscaping along Interstate 710 (I-710) to mitigate noise from the facility and the freeway. The design and development of the sound wall, including aesthetic treatments and landscaping, requires consultation with CalTrans, the public and local government. Additionally, CalTrans requires an encroachment permit for this project.

DATA REQUEST

- 117. Please provide information on the landscaping plans and sound wall design along with how Caltrans, the public and local government will be brought into the process.
- 118. Please provide a completed CalTrans Encroachment Permit, a copy of the plans and a set of the hydrology/hydraulic calculations.

BACKGROUND

The location of the project in relation to I-710 could result in glare from night lighting or the structure's exterior during the day. This potential glare could create a traffic hazard.

DATA REQUEST

119. Please provide information on how the project proposes to minimize glare created by the structure's exterior during the day or at night from illumination.

BACKGROUND

The project has two exhaust stacks of approximately 140 feet in height. These stacks could have an impact on traffic flow on I-710 due to proposed lighting and shade/shadowing.

DATA REQUEST

- 120. Please provide information on how the project plans to minimize lighting at night to minimize potential impacts of the project to meet CalTrans standards.
- 121. Please provide an analysis that determines if the shades/shadows from the towers pose a safety hazard to motorists.

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TECHNICAL AREA: Noise AUTHOR: Tom Murphy

BACKGROUND

In the AFC, the applicant provided information regarding the applicable LORS. Initial staff review indicates that there may be applicable LORS that have not been identified in the application. Specifically, the County of Los Angeles has noise and vibration ordinances that upon initial review appear to be potentially applicable for project construction and operation.

DATA REQUEST

122. Please review the applicable agency LORS, contact agency staff, and address ordinances or plan requirements that are not currently addressed in the AFC (Section 5.12.1.3). Please provide a table with the contact information (agency, address and telephone number) for the County and City staff that you contact to confirm/complete the LORS analysis.

BACKGROUND

In the AFC, the applicant has concluded that the noise impacts from project construction will be insignificant. This conclusion is based on projections of construction noise levels. Staff needs clarification of these projections.

DATA REQUEST

- 123. Please provide a detailed calculation methodology and calculation data for the construction noise analysis. Please include the assumption for any equipment sound level mitigation, including unmitigated and mitigated sound levels for the equipment assumed during construction.
- 124. The application does not identify when the sound wall, which is being proposed to mitigate the noise impact at the Thunderbird Mobile Home Park, will be constructed. Please provide the schedule for this construction and identify whether it will mitigate construction noise impacts.

BACKGROUND

In the AFC, the applicant has concluded that the noise impacts from project operation will be insignificant. This conclusion is based on projections of operation noise levels. Staff needs clarification of several of these projections.

October 24, 2000 15 Noise

DATA REQUESTS

- 125. Please provide a detailed calculation methodology and calculation data for the operation noise analysis. Please include the assumptions for the equipment sound level mitigation, including unmitigated and mitigated sound level data for all equipment included in the analysis.
- 126. Table 5.12.9 provides the unmitigated equipment sound power levels. Please revise this table to include the mitigated equipment overall sound power levels after application of the proposed mitigation. These values should be identical to those provided in the calculation data required to complete the previous data request item.
- 127. Please provide the mitigated project and total sound levels anticipated at the Thunderbird Mobile Home Park after the installation of the proposed sound wall. Provide necessary calculation methodology and assumption data necessary for staff review of the mitigated sound levels.
- 128. The CEC (as well as CEQA) requires the analysis of cumulative impacts in the AFC process. There is no discussion in the Noise Section of other permitted or proposed projects that could create cumulative noise impacts in the AFC. Please provide us with a detailed discussion of whether or not any potential cumulative impacts would occur from the construction and operation of this power plant considering other permitted and proposed projects in the immediate project site area.

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TECHNICAL AREA: Soils and Water Resources

AUTHORS: Joe Crea and Rich Sapudar

BACKGROUND

A stormwater and erosion/sediment control plan for the facility and all linear facilities is needed as part of the Storm Water Pollution Prevention Plan (SWPPP).

DATA REQUEST

129. Provide a stormwater and an erosion/sediment control plan for the facility and all associated linear facilities. The plan should include a detailed set of drawings that depict existing and proposed topography, structures and facilities. BMP related facility locations should be provided on the mapping. A mapping symbols legend should also be included on the drawings. The narrative should include stormwater calculations and vegetative stabilization procedures. As part of the SWPPP, provide a hazardous materials storage and disposal plan along with measures for spill prevention and containment. The plan should also identify maintenance and monitoring efforts for all erosion, stormwater runoff control and revegetation efforts.

BACKGROUND

The project intends to obtain 248 acre-feet per year of potable from the City of Southgate for use as service water, fire water supply, and supply water to the cycle makeup treatment system.

DATA REQUEST

- 130. Provide a will serve letter from the City of Southgate which states that they have available capacity and will provide the potable water needed by the project for service and supply water needs for the cycle makeup treatment system. The letter should describe the specific volumes of water to be supplied and any conditions, restrictions, or requirements for this water to be provided to the project.
- 131. Provide a detailed discussion of processes, equipment requirements, and costs associated with using reclaimed water rather than potable water for CT Evaporative Inlet Cooling, Cycle Makeup Treatment System, Plant and Equipment Drains, Chemical Drains/Flushing, or any other non-potable or sanitary purposes for which potable water is not absolutely necessary.

BACKGROUND

The project intends to use 3,344 acre-feet per year of reclaimed water provided by the Central Basin Municipal Water District or cooling tower makeup purposes.

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DATA REQUEST

- 132. Provide a will serve letter from the Central Basin Municipal Water District which states that they have available capacity and will provide the reclaimed water needed by the project. The letter should describe the specific volumes of water to be supplied and any conditions, restrictions, or requirements for this water to be provided to the project.
- 133. Provide a discussion of how project will respond to a situation where reclaimed water is either insufficient or not available due to a failure in either the production or delivery systems.

BACKGROUND

The project intends to discharge wastewater to the Los Angeles County Sanitation City District POTW via connection to the City of South Gate's sewer system.

DATA REQUEST

- 134. Provide letters from the Los Angeles County Sanitation Districts and the from the City of South Gate which states that these agencies will accept the wastewater discharge from the project. The letter should describe the specific volumes of water to be accepted and any conditions, restrictions, or requirements for this wastewater to be discharged these systems.
- 135. Provide a schedule that leads to the project obtaining a draft of the required Industrial Wastewater Discharge Permit from the Los Angeles County Sanitation Districts at least 30-days prior to the date scheduled for the Final Staff Assessment.

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